

UNITED STATES DISTRICT COURT  
~~EASTERN~~ Western DISTRICT OF MISSOURI  
DIVISION

Lacy A. Wheeler

201 Brown St

Cleves, MO 65631

(Enter above the full name of the Plaintiff[s]  
in this action.)

- vs -

Stone County MO

Chickens Division

Mercy Hospital

Administration

(Enter above the full name of ALL Defendant[s] in this action. Fed. R. Civ. P. 10(a) requires that the caption of the complaint include the names of all the parties. Merely listing one party and "et al." is insufficient. Please attach additional sheets if necessary.)

Case No.

17-cv-3211-MDH

(To be assigned by Clerk  
of District Court)

COMPLAINT

Request for  
injunction

- I. State the grounds for filing this case is Federal Court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

Plaintiff, Lacy A. Wheeler  
more specifically known as.  
U.S. Constitutional Bill of Rights Amendments, four, five, six,  
and 7<sup>th</sup>. Her 14<sup>th</sup> Amendment under The Citizenship Clause.  
Also 45 CFR Part 160 and sub parts A and E of part 164  
were violated by all defendants listed in this case.  
Civil Rights were violated.

II.

Plaintiff, Lacy Wheeler resides at  
201 Brown St. Cleveland Christian  
street address city county  
MO 65831 417-606-0569  
state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

III.

Defendant, Stone Co Childrens Division lives at, or its business is located at  
30832 State Hwy 413 Galena Stone  
street address city county  
MO 65832  
state zip code

(if more than one defendant, provide the same information for each defendant below)

Notice Attachments for  
defendants

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Jill Braden  
Chief Juvenile Officer  
309 E Cleveland Ave  
Monett / Barry County  
Missouri / 65708  
417-235-6245

Defendant No. 2

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Shannon Doyle  
Chief Deputy Juvenile Officer  
39th Circuit / Stone County  
Missouri / 65656

Defendant No. 3

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Judge Mark Stephens  
Associate Circuit Judge  
110 S Maple St / Stone County  
Galena  
Missouri / 65656  
417-357-6114

Defendant No. 4

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Garrett Norelle  
39th Circuit manager  
Galena / Stone County  
Missouri / 65656  
417-357-6118

Ad Litem J. Patrick Sullivan  
Galena / Stone County  
16585 St. Hwy 13 STED  
Branson West  
Missouri / 65737  
417-272-1444

Cheri Norton  
Foster Parent

Darlene Parrigon  
DSS Attorney  
39th Circuit Juvenile Office  
PO Box A  
Pierce City MO 65723

Cheryl Titsworth  
Office Supervisor  
Galena / Stone County  
Missouri / 65686  
417-357-3083

Samantha J Phillips  
Deputy Court Clerk  
Galena / Stone County  
Missouri / 65686  
417-357-3088



Tyne Johnson CSSI  
34th Circuit Childrens division  
Galena / Stone County  
Missouri / 65656  
417-357-6118 ext 243

Renee Wilson CDW11  
Contracted Case management oversight Specialist  
Galena / Stone County  
Missouri / 65656  
417-357-6118 ext 240

Crystal Kennedy  
Childrens division

Ad Litem Mark Rundell  
Galena / Stone County  
Missouri / 65656

Jessie Davis  
Greene CO Division of Social Services

Judge Alan Blankenship  
Associate Circuit Judge  
Galena / Stone County  
PO Box 156  
Missouri / 65656

Teri Armistead  
Office of the Child Advocate

Tessa Decosta  
DSS Supervisor

Mary Brehacek  
DSS Supervisor

Wren Armstrong  
Contracted Caseworker

Anna Latham  
Caseworker

Springfield Partners LLC  
Contracted Placing Agency

Missouri Governor  
Eric Greitens  
PO Box 720  
Jefferson City MO, 65102

Missouri Attorney General  
Josh Hawley  
PO Box 899  
Jefferson City MO 65102

Mercy Hospital Risk Management  
Anita Sandwell

Mercy Hospital Administration  
Dr. Allen Starrow

Mercy Health Information  
Management

Mercy Care Management

Mercy Security and Privacy

Mercy Hospital Directors

Elizabeth S. Andrews  
M.D.

John Bursom  
M.D.

Mercy Director of Materials  
Management

Greene CO MO Department  
of Social Services

Missouri State Department  
of Social Services

Missouri State Family  
Support Division

Paula D Nelson  
LCSW

Mercy Care management  
417-820-2143

Kimberly Harms  
LCSW

Mercy Social worker  
417-820-7941

Amelia KLO  
MSW Social worker  
417-838-7680

Jennifer Denny Hill  
LCSW  
417-838-7513

Shelia Dullum  
Mercy Social worker

Mercy Hospital  
mother and baby unit 5A



- IV. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary):

Take notice to highlighted area from partial documents of medical records, and attached copies of forms from prior meetings, and hearings

On the day of July 28<sup>th</sup> 2016,

Portraying the role of their employee status, and standing in representation of The Missouri Department of Social Services, and Juvenile Department. Jill Braden, Shannon Doyle, and Jessica Wren Armstrong Aka Wren Armstrong, among many others stated in the Complaint. Willfully and knowingly initiated the start of a Protective Custody Order. The Custody order was void, upon arrival, and without due process, also without lawful jurisdiction. Through further investigation, and with the substantiated proof, along with supporting documentation; The courts can be made aware of the defendants and their roles and participation in the illegal implementation of an Emergency Protective Custody case. The repetitive unjustifiable conduct started with the CS-33 form, the only form Wren had when she arrived at the hospital

a void act cannot legally be consistent with a valid one, the CS-33 form was expired and never signed by a Judge. The CS-33 form was insufficient where it merely parroted statutory language without specifying, any act or violation. Hospital Administration becomes responsible for retaining custody until the next regular weekday session of family court. It was on a Saturday when when demanded to take the baby. Social Service law states that "In no event shall an employee of the Division upon their own remove a child, That power is vested in the Juvenile Officer, or police officer. It is also current federal regulation "In efforts to prevent Placement, before removal of a child attempts should be made to strengthen and rehabilitate the family. No Efforts were afforded on their behalf, Efforts were offered on my behalf but disregarded.



In uniform Business Records Acts  
It states ~~Before~~ Children can  
be removed from a home, Parents  
and Children have the right to  
an impartial hearing before an  
impartial Judge. Also lab results  
are beyond any Caseworkers  
area of expertise. Giving professional  
opinion beyond ones area of expertise  
is a clear violation of Professional  
ethics, Such as the use of lab work  
results on the CS-33 form, and  
take notice to the nurses notes in  
my medical record where Wren  
stated that the baby was  
medically sound for discharge,  
and demanded Dr. Andrews  
discharge the infant.

The National Center for  
Substance abuse and Child Welfare  
Policy, States that drug testing  
alone cannot determine the  
existence or absence of a substance  
abuse or use disorder, In addition  
drug test do not provide sufficient  
information for substantiating  
allegations of child abuse or neglect  
or for making decisions about the  
dispositions of a case including removal  
reunification or termination. ③



These incidents are just merely a few from numerous wrong doings to an expecting mothers worst nightmare, made into reality. Based on these findings, I ask the Court to further investigate, and grant myself to proceed in Forma Pauperis, and that an order of protection be granted to me, to restrain Missouri Department of Social Services and Mercy Hospital administration until further notice. My Civil Rights were violated under the U.S Constitutional Bill of Rights Amendments four, five, six and 7th under the 14th Amendment the Citizenship Clause, ALSO 45 CFR Part 160 and Sub parts A and E of part 164, were all violated by all defendants listed in this case.

Jay Wheeler  
07/07/17

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